

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

NATIONAL CONTINENTAL)	
INSURANCE CO.)	
Plaintiff)	
V.)	17-CV-02703
AS CORP, INC. and WALTER)	
CARTER, and JAMES WOODS, and)	
RISINGER BROS. TRANSFER INC.)	
Defendants)	

**DEFENDANT JAMES WOODS' REPLY TO PLAINTIFF'S COMBINED
MEMORANDUM AND ITS MOTION FOR SUMMARY JUDGMENT**

Defendant, JAMES WOODS, states the following:

Defendant Woods adopts as his own, Risinger Bros Transfer Inc.'s Reply to National Continental Insurance Company's combined memorandum, and reiterates its arguments made in Woods' Response to the Summary Judgment Motion.

Defendant prays that the Court will take cognisance of, and be guided by National Continental Insurance Company v. Gian Singh, as Representative of the Estate of Harpreet Singh, Sumeet Singh, AG Express Inc, and D Line Logistics, INC., 17-cv-2603, and National Continental Insurance Company v Nikola Vukovic, AAA Freight Inc. And Milan Rancic, 17-cv-2607.

Vukovic is the most recent decision in our own jurisdiction (March 25, 2019), with the same plaintiff, same insurance policy, and the same issues. Vukovic extensively cites and adopts the reasoning in Singh, also the same insurance company, same policy, and same issues.

Wherefore Defendant James Woods prays that Plaintiff's Motion for Summary Judgment be denied.

Respectfully submitted,


Bruce Radzin

Bruce Radzin
415 N. LaSalle Street-300A, Chicago, Illinois, 60654
312-222-0000, 312-222-1656 fax
bruce@radzin.com